

# 2

Export Certification  
Manual

# Methods And Procedures

## *Inspectional Guidelines*

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### Introduction

The inspection and verification of plants or plant products offered for export determines whether or not the shipment meets the import requirements of the foreign country. Authorized Certification Officials (ACO's) should refer to the export summary of the foreign country **before** beginning their inspection. In addition, Authorized Certification Officials (ACO's) should review import permits (IP's) or special authorizations that were presented to ensure that the shipment meets any additional requirements listed in the documents.

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### Special Inspectional Guidelines

The inspectional guidelines in this subsection are general and can be used for a majority of the plants or plant products offered for export. Inspection and verification procedures that are specific for certain plants or plant products warrant special attention and are under the last three sections of Methods and Procedures. The special procedures cover the standardized inspectional guidelines for:

- ◆ Protected plants (ESA or CITES material)
- ◆ Mail exports
- ◆ Containerized oak lumber

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### Compliance Agreements

Compliance agreements (PPQ Form 519) are written understandings made among certain industries and USDA to assist in the certification of plants and plant products offered for export.

Compliance agreements may be appropriate in the area of establishing procedures for certification of cotton (see [Appendix H](#)).

Contact ES for approval prior to the development of compliance agreements.

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## Prepare for Inspection

During the preliminary assessment, one of the items received from the exporter is the tentative shipping date. When you know the shipping date, you can regulate the time of inspection based on the foreign country's requirements and your work schedule. Specific time limits are in export summaries. If a time limit is not specified, then the general time limit for inspections is not more than 30 days before export, **unless the export summary states it differently** (see [Figure 2-4-5](#)).

Arrangements for inspections are to be coordinated with the appropriate shipping official in order to determine the availability of the plants or plant products for inspection, their location, and the loading time. Inspections should not begin until the plants or plant products are all together, clearly marked, and labelled.

### Overview of Procedures:

Procedures of general inspectional guidelines for plants or plant products are referenced in [Figure 2-4-1](#).

- ◆ "Step 1—Find Out if the Exporter Has an Acceptable Inspectional Certificate:" on [page-2-4-3](#)
- ◆ "Step 2—Determine if a Laboratory Examination Is Required:" on [page-2-4-5](#)
- ◆ "Step 3—Check the Shipping Date:" on [page-2-4-6](#)
- ◆ "Step 4—Decide What Sample Size to Inspect:" on [page-2-4-7](#)
- ◆ "Step 5—Compare the Shipment With Supporting Documents:" on [page-2-4-10](#)
- ◆ "Step 6—Inspect the Product:" on [page-2-4-11](#)
- ◆ "Step 7—Obtain the Identity of a Pest:" on [page-2-4-12](#)
- ◆ "Step 8—Find the Pest in the Summary:" on [page-2-4-12](#)
- ◆ "Step 9—Look for Unauthorized Packing Material:" on [page-2-4-14](#)
- ◆ "Step 10—Record the Results of the Inspection on PPQ Form 572, 577, or 579:" on [page-2-4-14](#)
- ◆ "Step 11—Prepare Export Certificates:" on [page-2-4-15](#)

**FIGURE 2-4-1: Overview of general inspectional guidelines**

## General Inspectional Guidelines

### Step 1—Find Out if the Exporter Has an Acceptable Inspectional Certificate:

#### That Would Preclude an Additional Inspection:

1. Find out if the exporter has an acceptable inspectional certificate from another agency or organization. The certificates listed in **Figure 2-4-1** can be accepted only if their inspectional procedures are routinely monitored by PPQ personnel **and the certificate is the original** (a faxed copy of the original may be accepted as the original when it is faxed directly from the issuing agency and the associated phytosanitary certificate number was marked on the original before it was faxed); then go to **Table 2-4-2** and decide whether or not you will waive the inspection based on that certification.

TABLE 2-4-1: Acceptable inspectional certificates

Issuing office:	Form:	Description and notes:
Agricultural Marketing Service (AMS)	FV-146	Certificate of Quality and Condition (Processed Foods)
	FV-147	Certificate of Quality and Condition (Processed Foods) Quality Assurance
	FV-149	Certificate of Quality and Condition (Processed Foods) Continuous Inspection
	FV-294 <sup>1</sup>	Report on Sanitary Inspection issued for apples, pears, Emperor grapes, and some vegetables
Federal Grain Inspection Service <sup>2</sup>	FGIS-921	Inspection Report—Insects in Grain (should be used in conjunction with its log and/or appropriate certificate) <sup>3</sup>
Federal Grain Inspection Service <sup>2</sup>	FGIS-905-1	Official Sample—Lot Inspection <sup>3</sup>
	FGIS-909	Official Export Grain Certificate <sup>3</sup>
	FGIS-909-1	
	FGIS-909-2	
	FGIS-912	Bean Inspection Certificate <sup>3</sup>
Florida <sup>1</sup>	FGIS 993	Commodity Inspection Certificate
	FV-185-C	Florida Export Citrus Fruit Inspection Report
Various States	State phytosanitary certificate	Can be used only to attest to the import requirements of a foreign country that <b>cannot</b> be ascertained at the time of export (e.g., growing season inspection, freedom from certain pests at the place of growing or production, specific origin)

- 1 In cases where the AMS form does not meet a country's phytosanitary requirements, it will be necessary to obtain a State phytosanitary certificate attesting to the requirements or conduct an additional inspection or treatment. For instance, if freedom from specific quarantine pests is required by a particular country and the pests are not listed on the FV Form 294 issued by the AMS, an additional phytosanitary inspection must be conducted before the fruit can be certified.

Also, specific statements may be required on the form relating to sampling guidelines and freedom from pests. For example, when fruit is being inspected for Colombia, Brazil, or Venezuela, the following statement is required on the form: "This fruit was inspected for exports to (enter destination country) and was found free of codling moth, San Jose scale, and apple maggot. The rate of inspection was 2 percent with 1 percent of that being cut."

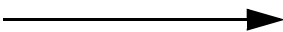
- 2 **CAUTION:** The following certificates issued by FGIS are **unacceptable**:  
IN-415, Official Certificate, Warehouseman's Sample—Lot Inspection  
FGIS-914, Official Certificate, Submitted Sample Inspection  
FGIS-915, Official Stowage Examination Certificate  
FGIS-916, Official Certificate
- 3 See "Appendix D" on [page D-1-1](#) for a sample of the Certificate or Report and a list of contacts for other agencies or organizations.

Also, specific statements may be required on the form relating to sampling guidelines and freedom from pests. For example, when fruit is being inspected for Colombia, Brazil, or Venezuela, the following statement is required on the form: "This fruit was inspected for exports to (enter destination country) and was found free of codling moth, San Jose scale, and apple maggot. The rate of inspection was 2 percent with 1 percent of that being cut."

2. Decide whether or not an additional inspection (beyond verification) is necessary. Base your decision on:
  - ❖ The presence (or absence) of an acceptable inspectional certificate from another agency or organization
  - ❖ The import requirements specified by the foreign country
  - ❖ The credibility of the agency that conducted the inspection
  - ❖ The reliability of the statements made on the certificate

Use [Table 2-4-2](#) to take the appropriate action.

**TABLE 2-4-2: Regulating Previously Inspected Plants or Plant Products**

If the exporter:	And you decide:	Then:
Has an inspectional certificate from another office or agency	Only to verify the contents of the shipment (relying on the certificate issued by another office or agency for your inspection)	VERIFY the shipment, and go to page 2.5.1 for preparing the FPC
	To conduct an additional inspection	GO to <a href="#">Step 2</a>
Lacks an inspectional certificate		

**Step 2—Determine if a Laboratory Examination Is Required:**

Determine if a laboratory examination is required by the foreign country as a condition of entry for eligible plants or plant products or if a laboratory examination is needed to determine if a plant or plant product is free of the specified plant pest (e.g., bacteria, fungi, nematodes, viruses). Use [Table 2-4-3](#) to take the appropriate action.

**TABLE 2-4-3: Regulating Plants or Plant Products That May Require a Laboratory Examination**

If a laboratory or microscopic examination is:	Then:
Required or advisable	GO to <a href="#">Step 3</a>
<b>Not</b> required	GO to <a href="#">Step 4</a>

### Step 3—Check the Shipping Date:

Check the shipping date to make sure there is enough lead time to have the plants or plant products examined in a laboratory. Use **Table 2-4-4** to take the appropriate action.

**TABLE 2-4-4: Regulating Plants or Plant Products That Require a Laboratory Examination**

If there is:	Then:
<b>Not</b> enough lead time <sup>1</sup>	<ol style="list-style-type: none"><li>1. INFORM the exporter to apply for official sampling far enough in advance of the shipping date to allow for the laboratory examination</li><li>2. RESCHEDULE inspection to fit new shipping date to allow enough lead time</li></ol>
Enough lead time*	<ol style="list-style-type: none"><li>1. DRAW an official sample of the plants or plant products (refer to factors listed on page 2.4.7)</li><li>2. SEND the official sample to the nearest identifier, university or public laboratory, or an accredited laboratory as conditions warrant (Go to the following URL for information on laboratory accreditation: <a href="http://www.aphis.usda.gov/ppq/pim/accreditation/">http://www.aphis.usda.gov/ppq/pim/accreditation/</a>) or go to “Appendix Q” on <a href="#">page-Q-1-1</a></li><li>3. KEEP the exporter informed of delays that may arise from laboratory examination</li><li>4. CHECK the accuracy of the shipment against the supporting documents</li><li>5. GO to <a href="#">Step 4</a></li></ol>

<sup>1</sup> Lead time refers to the amount of time needed to inspect or examine a shipment before its shipping date. (Other countries interpret “shipping date” as the date a commodity physically leaves the exporting country.) Advise exporters they must export plants and plant products within the prescribed time limits following inspection. Time limits are referenced in [Figure 2-4-5](#).

**TABLE 2-4-5: Time Limits Between Inspection or Date of Issue and Shipping Date**

<b>If the country is:</b>	<b>Then:</b>
Austria, Belgium, Denmark Finland, France, Germany, Greece, Ireland (Republic of), Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden, or United Kingdom, Estonia, Hungary, Latvia, Slovenia, or Switzerland	The maximum time limit between the date of issue and shipping date is <b>14 calendar days</b>
Canada, Czech Republic, Hong Kong, Israel (propagative articles), Malaysia, Malta, New Zealand, Panama, South Africa, Poland, or Norway	The maximum time limit between inspection and the shipping date is <b>14 calendar days</b>
Cyprus, Colombia	The maximum time limit between inspection and the shipping date is <b>10 calendar days</b>
Yugoslavia	The maximum time limit between inspection and the shipping date is <b>15 calendar days</b>
Romania, or Turkey	The maximum time limit between inspection and the shipping date is <b>20 calendar days</b>
<b><i>Other than</i></b> those listed above	The maximum time limit between inspection and the shipping date is <b>30 calendar days</b>



Do not issue export certificates if the time limit between inspection (or date of issue for EU countries) and the shipping date has been exceeded unless the shipper presents a bill of lading showing the plant or plant product was shipped within the prescribed time limit.

#### **Step 4—Decide What Sample Size to Inspect:**

If an agricultural commodity for export is issued a phytosanitary certificate, then the commodity must be inspected. Decide if you are going to inspect the entire shipment or an officially drawn sample. Guide your decision by the following factors:

- ◆ Type of plants or plant products
- ◆ Existing guidelines
- ◆ Size of shipment
- ◆ Knowledge of the pest conditions and pest distribution where the plants or plant products were grown and produced
- ◆ Import requirements of the foreign country
- ◆ The directions provided to you by your port

Samples from the shipment of plants or plant products must be drawn by the Authorized Certification Official (ACO) or other designated personnel. The sample may be drawn by any of the following agencies or organizations:

- ◆ Federal, State or county regulatory personnel for all plants or plant products
- ◆ Federal Grain Inspection Service (FGIS) for grain and grain products
- ◆ State seed certification agencies or university/county Extension Service personnel for grain and grain products when under extenuating circumstances and by prior arrangement by the PPQ.

When sampling is the basis for certification, samples drawn must be large enough to represent the entire lot and must be of a nature to accurately reflect the conditions of the entire shipment.

The minimum inspection level for fruits and vegetables is 2 percent of the shipment's inspectional unit, i.e., boxes, units, bags, tray packs, etc. For example, a shipment of 400 boxes of fruit would require a minimum complete examination of 8 boxes ( $.02 \times 400 = 8$  boxes). Two percent is a minimal standard. Plant material, e.g., nursery stock, as well as other high risk material should be inspected at a higher level, 100 percent if practical. Commodities shipped in bulk, e.g., grain or potatoes, will require sampling techniques appropriate to the levels of pest risk and industry standards. This may be less than 2 percent. Consult the appropriate State or Federal regulatory officials for these inspectional levels.

Only officially drawn seed samples may be used for phytosanitary certification purposes. This may include samples for weed seed examination, laboratory analysis for pathogens, or insect examination. Seed samples drawn by a seed company or other industry representatives are not permitted. (**Table 2-4-6, “: Determining Sample Size,” on page-2-4-9**).



Phytosanitary Note #791, dated 02/08/95, clarifies the APHIS policy concerning the certification of seed for export.

Phytosanitary Note #803, dated 05/18/95), clarifies the APHIS policy concerning certification of grain for freedom from disease causing organisms.



**TABLE 2-4-6: Determining Sample Size**

If you:	Then:
Inspect 100 percent of the shipment	GO to <a href="#">Step 5</a>
Inspect only a portion of the shipment	<ol style="list-style-type: none"> <li>1. DETERMINE your representative sample using the following factors: <ul style="list-style-type: none"> <li>◆ Existing PPQ guidelines (import manuals for seeds, fruits and vegetables, and cut flowers)</li> <li>◆ Quantity of material</li> <li>◆ Area where the product was grown or produced</li> <li>◆ Requirements of the foreign country</li> <li>◆ Your previous experience with similar shipments</li> </ul> </li> <li>2. OBSERVE safety precautions (see <a href="#">Figure 2-4-2</a>)</li> <li>3. DRAW an official sample of the plants or plant products</li> <li>4. GO to <a href="#">Step 5</a></li> </ol>
Require an additional sample for laboratory examination	<ol style="list-style-type: none"> <li>1. DETERMINE your representative sample using the following factors: <ul style="list-style-type: none"> <li>◆ Existing guidelines (import manuals for seeds, fruits and vegetables, and cut flowers)</li> <li>◆ Quantity of material</li> <li>◆ Area where the product was grown or produced</li> <li>◆ Requirements of the foreign country</li> <li>◆ Your previous experience with similar shipments</li> </ul> </li> <li>2. OBSERVE safety precautions (see <a href="#">Figure 2-4-2</a>)</li> <li>3. DRAW an official sample of the plants or plant products</li> <li>4. SEND the official sample to the nearest identifier or authorized laboratory as conditions warrant</li> <li>5. GO to <a href="#">Step 5</a></li> </ol>

Safety Precautions—Check the label and invoice to learn if the plants or plant products were treated and with what. If you are unfamiliar with the pesticide used, attempt to get a pesticide label or description. If the exporter or the exporter's agent cannot supply a label or description of the pesticide used, then refuse to sample or inspect and then contact your supervisor. Check the label or description for special instructions regarding exposure. If examining seed, assume that brightly colored seed was treated—regardless of what the label says. Blue, orange, and pink colors confirm that the seed was treated. A powdery residue on the seed indicates it may have been treated.

Safety Procedures—

- ◆ If the material was treated or you feel uncertain—then use plastic gloves and a cartridge type dust mask. If you are continuously working with dusted seed, then replace the cartridge every 2 hours. If you are sensitive or allergic to chemicals, use a canister respirator instead of a dust mask.
- ◆ If there is the possibility of getting chemicals on your clothes, you must wear protective coveralls. Separately launder the coveralls after each use.
- ◆ If there is a possibility of getting pesticide in your eyes, you must wear eye protection.
- ◆ Avoid wiping your mouth, nose, or eyes with your hands.
- ◆ Wash your hands, face, and arms with soap and water immediately after sampling or inspecting treated material.
- ◆ If tools were used in the sampling or examination, then wipe them off after each use.
- ◆ If examining treated seed, then the PPQ pathologist should use the wet method technique for seed examination.

Keep Informed—It is possible to safely inspect seed that has been treated. Potential illness can be prevented! Well informed officers are more likely to take precautionary measures in handling treated seed, and these officers contribute to PPQ's excellent safety record. (For additional information on safety, see *Pesticide Safety* in the *PPQ Treatment Manual*)

**FIGURE 2-4-2: Safety precautions**

**Step 5—Compare the Shipment With Supporting Documents:**

Compare the type of the plants or plant products, the quantity, and the distinguishing marks and numbers with the supporting documents to see if they agree. Use **Table 2-4-7** to take the appropriate action.

**TABLE 2-4-7: Verifying That Plants or Plant Products Agree With Supporting Documents**

If:	And the exporter:	Then:
Supporting documents and the plants or plant products agree	→	GO to <b>Step 6</b>
Differences are found (allow the exporter to correct the discrepancies)	Corrects the discrepancies	
	Does <b>not</b> correct the discrepancies	REFUSE to issue an FPC

### Step 6—Inspect the Product:

Inspect the product for pests (general pests, those usually associated with that host, and those pests specifically listed in the summary or the foreign country of the IP). Use [Table 2-4-8](#) to take the appropriate action.

If possible, seed shipments should be inspected prior to treatment. If you inspect treated seed, take the necessary safety precautions. Look for insects, weed seed, ergot, etc. Requirements for laboratory testing must be met prior to seed treatment. Seed can not be certified based only on the fact that it is treated and/or vacuum packed. Appropriate seed sampling and inspection must always be conducted. (See APHIS, PPQ Plant Import-Propagative manual for guidelines on sampling shipments of seed packets and vacuum packed cans.)

Pelletized seed can not be certified unless the inspection is conducted prior to treatment.

**TABLE 2-4-8: Regulating Plants or Plant Products That May Have Pests**

If pests are:	Then:
Present	<ol style="list-style-type: none"> <li>1. TELL the exporter of the pest infestation/infection when you anticipate a delay to allow for identification and/or reconditioning</li> <li>2. IDENTIFY the pest by scientific name</li> <li>3. GO to <a href="#">Step 7</a></li> </ol>
Absent	GO to <a href="#">Step 9</a>

## Step 7—Obtain the Identity of a Pest:

Obtain the identity of the present pest. Use [Table 2-4-9](#) to take the appropriate action.

**TABLE 2-4-9: Identifying Plant Pests**

If you are a:	And you:	Then:
PPQ officer	Have identification authority for the pest	GO to <a href="#">Step 8</a>
	Cannot identify the pest or you lack identification authority for the pest	1. COMPLETE a PPQ Form 309 or 309a 2. SEND the pest to the nearest identifier for identification 3. INFORM the exporter of the delay 4. GO to <a href="#">Step 8</a>
State or county cooperator	Have identification authority for the pest	GO to <a href="#">Step 8</a>
	Cannot identify the pest or you lack identification authority for the pest	1. SEND the pest to the nearest State or Federal identifier for identification 2. INFORM the exporter of the delay 3. GO to <a href="#">Step 8</a>

## Step 8—Find the Pest in the Summary:



After a pest is identified, check the EXCERPT summary of the foreign country and/or the import permit (IP) and determine if the pest is one of the following:

- ◆ **Quarantine significant** to the foreign country, OR
- ◆ Recognized as being an injurious plant pest. **We must comply with the certifying statement on the FPC, which includes the statement “considered to be free from quarantine pests.” In addition, it is APHIS policy to continue to inspect and certify consignments practically free<sup>1</sup> from other injurious pests.**

<sup>1</sup> As a working definition for export certification purposes, **practically free** means not to exceed a 2 percent infestation level unless otherwise stated by the importing country. Also, **practically free** refers to a judgement that the pests are not in excess of the amount expected to result from, and be consistent with good culturing and handling practices employed in the production and marketing of the commodity. When FGIS certificates are used as supporting documentation for certifying grain, **practically free** refers to FGIS acceptance standards for weevils found in grain.

Use **Table 2-4-10** to determine your action if a plant pest is found in the shipment.

**TABLE 2-4-10: Regulating Plants and Plant Products That Have Quarantine Significant Pests**

If the pest is:	And considered to be:	And found under a:	Then:
Listed in EXCERPT as being <b>quarantine significant</b> to the foreign country			GO to <b>Table 2-4-11</b> and determine the appropriate action
<b>Not</b> listed in EXCERPT as being <b>quarantine significant</b> to the foreign country	Injurious to the commodity	Practically free condition <sup>1</sup>	GO to <b>Step 9</b>
		<b>Not</b> practically free condition <sup>1</sup>	GO to <b>Table 2-4-11</b> and determine the appropriate action
	<b>Not</b> injurious to the commodity		GO to <b>Step 9</b>

<sup>1</sup> As a working definition for export certification purposes, **practically free** means not to exceed a 2 percent infestation level unless otherwise stated by the importing country. Also, **practically free** refers to a judgement that the pests are not in excess of the amount expected to result from, and be consistent with good culturing and handling practices employed in the production and marketing of the commodity. When FGIS certificates are used as supporting documentation for certifying grain, **practically free** refers to FGIS acceptance standards for weevils found in grain.

If the infestation is of quarantine importance or is to an extent that the shipment cannot be considered practically free, then refuse certification until reconditioning or treatment can take place. Use **Table 2-4-11** to determine your action when considering treatment of an infested or infected shipment.


**TABLE 2-4-11: Regulating Plants and Plant Products When a Treatment for Pests May Be Considered**

If a treatment is:	Then:
Available for the pest and the treatment is acceptable by the foreign country	<ul style="list-style-type: none"> <li>◆ ALLOW the exporter to treat the plants or plant products</li> <li>◆ SUPERVISE the treatment</li> </ul> <p><b>NOTE:</b> No mention of the pest is to be made on the certificate. Details of the treatment are to be recorded on the PFC</p> <ul style="list-style-type: none"> <li>◆ GO to <b>Step 9</b></li> </ul>
Unavailable for the pest or the treatment is unacceptable to the foreign country as a condition of entry	REFUSE to issue an FPC

### Step 9—Look for Unauthorized Packing Material:

Look for unauthorized packing material, bagging, containers, and soil. Use **Table 2-4-12** to take appropriate action.

**TABLE 2-4-12: Regulating Plants or Plant Products That Have Unauthorized Packing Material**

If the shipment is:	And the exporter:	Then:
Free from soil <i>and</i> unauthorized packing material, bagging, or containers		GO to <b>Step 10</b> , and record the details of your inspection
Contaminated with soil or unauthorized packing material, bagging, or containers were used	Cleans, treats, and/or reconditions shipment	REFUSE to issue an FPC
	Refuses to clean, treat, or recondition shipment	

### Step 10—Record the Results of the Inspection on PPQ Form 572, 577, or 579:

Record the results of the inspection and additional information about the export that will help determine if you will certify the plants or plant products.

The inspectional information that must be recorded on PPQ Form 572, 577, or 579 is:

- ◆ Place (port and location) where the product was inspected
- ◆ Percentage of material inspected
- ◆ Percentage of material infested or infected
- ◆ Pests intercepted and/or treatments given
- ◆ Actions taken by the exporter, as a result of the inspection, to make the plants or plant products eligible for certification, such as repackaging, reconditioning, or debarking
- ◆ Any unusual situations concerning the shipment
- ◆ Your name
- ◆ Date and time of the inspection

Use **Table 2-4-13** to determine where to record the results of the inspection and additional information.

**TABLE 2-4-13: Recording Results of Inspection**

If you have:	Then:
A PPQ Form 572, Application for Certification	<ol style="list-style-type: none"> <li>1. RECORD your inspection results in the section entitled, "Export Inspection Data," and ATTACH the application to the issuing office copy of the certificate</li> <li>2. CONTINUE to <a href="#">Step 11</a></li> </ol>
Only a PPQ Form 577 or PPQ Form 579, Federal Export Certificate	<ol style="list-style-type: none"> <li>1. RECORD your inspection results on the reverse side of the issuing office copy of the certificate</li> <li>2. CONTINUE to <a href="#">Step 11</a></li> </ol>

### Step 11—Prepare Export Certificates:

After recording the results of the inspection, conclude the certification process by completing and issuing the proper certificate. Use [Table 2-4-14](#) to determine where to find instructions for completing the appropriate forms.

**TABLE 2-4-14: Completing Certification Forms**

If you are certifying:	Then:
Domestic plants or plant products	GO to page 2.5.1 to complete PPQ Form 577, Federal Phytosanitary Certificate <sup>1</sup>
Foreign plants or plant products	GO to page 2.6.5 to complete PPQ Form 579, Reexport Certificate <sup>1</sup>

<sup>1</sup> If you are a **PPQ officer**, refer to Appendix 1, Fees and Costs, for collecting user fees for export certificates.

If you are a **State or county cooperator**, refer to local policy for collecting user fees, if applicable.

